

Exhibit “1”

Jennifer Myers Chalal

From: Glenn Davis <GDavis@ldylaw.com>
Sent: Tuesday, July 18, 2023 3:28 PM
To: Jennifer Myers Chalal
Subject: Anne Whitney Collins

{EXTERNAL EMAIL} This message originated outside of your organization.

Attorney Chalal,

I observed that your firm has filed a Complaint in federal court on behalf of Ms. Collins. Please mail a copy of the Complaint along with the waiver of service to my office and we will sign and return on behalf of Eastern University. Thanking you in advance.

Glenn R. Davis, Esquire
Latsha Davis & Marshall, P.C.
1700 Bent Creek Blvd., Suite 140
Mechanicsburg, PA 17050
Phone: 717-620-2424
Fax: 717-620-2444



Exhibit “2”



sgrvlaw.com

July 20, 2023

Jennifer M. Chalal
Direct Dial Number
P 215.241.8817
Direct Fax Number
F 215.531.9134
jchalal@sgrvlaw.com

Seven Penn Center
1635 Market Street
7th floor
Philadelphia, PA 19103
P 215.241.8888
F 215.241.8844

Admitted to practice:
Pennsylvania
New Jersey

Via Electronic Mail GDavis@ldylaw.com

Glenn R. Davis, Esquire
Latsha Davis & Marshall, P.C.
1700 Bent Creek Blvd., Suite 140
Mechanicsburg, PA 17050

**Re: *Ann Whitney Collins v. Eastern University*
C/M #061748-0001**

Dear Mr. Davis:

Attached is a Summons, Complaint and Waiver of Service regarding the above-captioned matter. If you have any questions, please contact our office.

Thank you.

Very truly yours,

Jennifer M. Chalal

Jennifer M. Chalal

JMC/ddi
Attachment

Exhibit “3”

LATSHA DAVIS & MARSHALL



ATTORNEYS AT LAW

WRITER'S E-MAIL: gdavis@ldylaw.com

July 31, 2023

Via email: jmyers@sgrvlaw.com

Jennifer Myers Chalal, Esquire
Spector Gadon Rosen Vinci P.C.
1635 Market Street, 7th Floor
Philadelphia, PA 19103

Re: Anne Whitney Collins
Docket No. 2:23-CV-02693-PD
Our File No. 2687/21822

Dear Attorney Chalal:

Please find enclosed along with this letter an executed Waiver of Service of Summons on behalf of Eastern University.

If you would like to discuss this matter, please feel free to call my office at your convenience.

Very truly yours,



Glenn R. Davis

GRD/jfa

AO 399 (01/09) Waiver of the Service of Summons

UNITED STATES DISTRICT COURT

for the
Eastern District of Pennsylvania

ANNE WHITNEY COLLINS

Plaintiff

v.

EASTERN UNIVERSITY

Defendant

Civil Action No. 2:23-CV-02693-PD

WAIVER OF THE SERVICE OF SUMMONS

To: Glenn R. Davis, Esquire

(Name of the plaintiff's attorney or unrepresented plaintiff)

I have received your request to waive service of a summons in this action along with a copy of the complaint, two copies of this waiver form, and a prepaid means of returning one signed copy of the form to you.

I, or the entity I represent, agree to save the expense of serving a summons and complaint in this case.

I understand that I, or the entity I represent, will keep all defenses or objections to the lawsuit, the court's jurisdiction, and the venue of the action, but that I waive any objections to the absence of a summons or of service.

I also understand that I, or the entity I represent, must file and serve an answer or a motion under Rule 12 within 60 days from 07/20/2023, the date when this request was sent (or 90 days if it was sent outside the United States). If I fail to do so, a default judgment will be entered against me or the entity I represent.

Date: 07/20/2023*Signature of the attorney or unrepresented party*

Glenn R. Davis, Esquire

*Printed name of party waiving service of summons**Printed name*

Latsha Davis & Marshall, P.C.
1700 Bent Creek Blvd., Suite 140
Mechanicsburg, PA 17050

Address

GDavis@ldylaw.com

E-mail address

(717) 620-2424

Telephone number

Duty to Avoid Unnecessary Expenses of Serving a Summons

Rule 4 of the Federal Rules of Civil Procedure requires certain defendants to cooperate in saving unnecessary expenses of serving a summons and complaint. A defendant who is located in the United States and who fails to return a signed waiver of service requested by a plaintiff located in the United States will be required to pay the expenses of service, unless the defendant shows good cause for the failure.

"Good cause" does *not* include a belief that the lawsuit is groundless, or that it has been brought in an improper venue, or that the court has no jurisdiction over this matter or over the defendant or the defendant's property.

If the waiver is signed and returned, you can still make these and all other defenses and objections, but you cannot object to the absence of a summons or of service.

If you waive service, then you must, within the time specified on the waiver form, serve an answer or a motion under Rule 12 on the plaintiff and file a copy with the court. By signing and returning the waiver form, you are allowed more time to respond than if a summons had been served.